

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

BRANDON-MEION BROWN,

Next Friend of PETER-EUGENE ALVARADO,

Plaintiff,

v.

BRAZORIA COUNTY SHERIFF'S OFFICE / BRAZORIA COUNTY JAIL;

BRAZOSPORT INDEPENDENT SCHOOL DISTRICT POLICE DEPARTMENT;

LIGHTHOUSE LEARNING CENTER (BISD DAEP CAMPUS);

CAPTAIN M. CRITTENDEN, in his individual and official capacities,

Defendants.

CIVIL ACTION NO. 4:25-CV-03231

PLAINTIFF'S FIRST AMENDED COMPLAINT

I. INTRODUCTION

This is a civil rights action arising under the Constitution and laws of the United States, including 42 U.S.C. § 1983, the Americans with Disabilities Act (ADA), and related federal statutes.

Plaintiff brings this action on behalf of his son, Peter-Eugene Alvarado, a young adult with a documented intellectual disability and serious cardiac condition, who was subjected to custodial interrogation, arrest, detention, and prolonged incarceration without required legal and disability-based protections.

United States Courts
Southern District of Texas
FILED

JAN 07 2026

Nathan Ochsner, Clerk of Court

Defendants acted under color of state law and, through acts and omissions, violated Alvarado's constitutional rights, statutory disability protections, and rights to due process and equal protection.

II. JURISDICTION AND VENUE

This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343, and 42 U.S.C. § 1983, as this

action arises under the Constitution and laws of the United States.

Venue is proper in this District under 28 U.S.C. § 1391(b) because the events giving rise to this action occurred in Brazoria County, Texas, within the Southern District of Texas.

III. PARTIES

Plaintiff Brandon–Meion Brown is the father and next friend of Peter-Eugene Alvarado.

Peter-Eugene Alvarado is a person with an intellectual disability and a serious cardiac condition requiring special accommodations to understand questioning, legal proceedings, and custodial environments.

Defendant Brazoria County Sheriff's Office / Brazoria County Jail is a governmental entity responsible for detention, custodial care, and inmate safety in Brazoria County.

Defendant Brazosport Independent School District Police Department (BISD PD) is a state-created law enforcement agency exercising police authority within BISD facilities.

Defendant Lighthouse Learning Center is a BISD Disciplinary Alternative Education Program (DAEP) campus, operating under BISD authority and subject to federal disability and constitutional obligations.

Defendant Captain M. Crittenden was at all relevant times a BISD Police Captain acting under color of state law.

IV. FACTUAL BACKGROUND

On April 24, 2025, Peter-Eugene Alvarado was taken into custody following events occurring at Lighthouse Learning Center, a BISD DAEP campus in Clute, Texas.

At all relevant times, Defendants knew or should have known that Alvarado:

Had an intellectual disability;

Had undergone critical heart surgery;

Required reasonable accommodations to understand questioning, custodial processes, and legal proceedings.

Despite this knowledge, Defendants questioned Alvarado without ensuring comprehension, without appropriate accommodations, and without adequate protective safeguards.

Alvarado was treated as an adult for custodial interrogation purposes without any capacity evaluation, disability accommodation, or protective support.

Defendants failed to ensure that Alvarado meaningfully understood his Miranda rights, despite clear indicators that he lacked the capacity to comprehend them.

Following arrest, Alvarado was transported to and confined in the Brazoria County Jail, where he remained incarcerated for an extended period.

While detained, Defendants failed to provide reasonable accommodations for Alvarado's disability and medical condition and failed to ensure appropriate custodial safeguards.

As a result of Defendants' actions and omissions, Alvarado suffered psychological distress, confusion, trauma, and harm, and remains reluctant to discuss the incident due to ongoing trauma.

V. CLAIMS FOR RELIEF

COUNT I

42 U.S.C. § 1983 – Violation of Constitutional Rights

Defendants, acting under color of state law, deprived Alvarado of rights secured by the Fourth, Fifth, and Fourteenth Amendments, including:

Unlawful custodial interrogation;

Failure to ensure knowing and voluntary waiver of rights;

Deprivation of liberty without due process.

Defendants' conduct demonstrated deliberate indifference to Alvarado's known disabilities and constitutional protections.

COUNT II

Americans with Disabilities Act (42 U.S.C. § 12132)

Alvarado is a qualified individual with a disability.

Defendants are public entities subject to the ADA.

Defendants failed to provide reasonable accommodations necessary for Alvarado to understand questioning, detention conditions, and legal processes.

Defendants excluded Alvarado from meaningful participation in custodial and legal processes by reason of his disability.

COUNT III

Monell Liability – Policy, Practice, or Custom

The violations suffered by Alvarado were caused by Defendants' policies, practices, or customs, including:

Failure to train officers regarding disability accommodations;

Failure to implement safeguards for intellectually disabled individuals;

Failure to supervise and correct known risks.

VI. DAMAGES

As a direct and proximate result of Defendants' actions, Alvarado suffered:

Emotional distress;

Psychological trauma;

Loss of liberty;

Physical and mental suffering.

VII. INJUNCTIVE AND DECLARATORY RELIEF

Plaintiff seeks declaratory and injunctive relief requiring Defendants to implement constitutionally and statutorily compliant policies regarding disabled individuals in custodial settings.

VIII. PRAYER FOR RELIEF

Plaintiff respectfully requests that the Court:

- A. Enter judgment in favor of Plaintiff;
- B. Award compensatory damages;
- C. Award punitive damages where permitted by law;
- D. Grant declaratory and injunctive relief;
- E. Award costs and any other relief the Court deems just and proper.

IX. JURY DEMAND

Plaintiff demands trial by jury on all issues so triable.

Respectfully submitted,

Brandon–Meion Brown

Plaintiff, Pro Se

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